

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOHANZ X. SANTOS, ppa, DENISE COLON, )  
DENISE COLON, Individually, JESUS SANTOS, )

Plaintiffs, )

v. )

BOB'S DISCOUNT FURNITURE; REGENT )  
HOME DELIVERY; AGNILIZ ACOSTAS; )  
RAUL SANTOS, )

Defendants. )

FILED  
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2004 JUN 14 PM 2:40  
C.A. No. 03-12210-MEW

U.S. DISTRICT COURT  
DISTRICT OF MASS.

**PLAINTIFF'S, JOHANZ X. SANTOS, PPA, DENISE COLON, DENISE COLON,  
INDIVIDUALLY, AND JESUS SANTOS, INITIAL DISCLOSURE PURSUANT  
TO FED. R. CIV. P. 26(a)(1)**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), plaintiffs Johanz X Santos, ppa, Denise Colon, Denise Colon, Individually, and Jesus Santos ("plaintiffs") respectfully submits their initial disclosure statement. In accordance with Rule 26(a)(1), plaintiffs hereby make their initial disclosures based upon information reasonably available to them at the time.

**A. Rule 26(a)(1)(A)**

**[T]he name and, if known the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

1. Denise Colon  
1813 North 45<sup>th</sup> Street  
Pennsauken, NJ 08110  
(plaintiff)

2. Jesus M. Santos  
1813 North 45<sup>th</sup> Street  
Pennsauken, NJ 08110  
(Plaintiff)
3. Johanz X Santos  
1813 North 45<sup>th</sup> Street  
Pennsauken, NJ 08110  
(Plaintiff, minor)
4. Agniliz Acosta  
366 Summer Ave, 1<sup>st</sup> Floor  
Springfield, MA 01108  
(Defendant)
5. Raul Santos  
49 Eureka Street Apt.3  
Springfield, MA 01104  
(Defendant)
6. Raul Santos  
66 Mattoon Street, Apt#15  
Springfield, MA
7. Reshawn Holmes  
23 William Sands Jr. Road  
Springfield, MA
8. Deanna Green  
927 Worthington Street, Apt#2-B  
Springfield, MA
9. Luis Santiago  
27 Federal Street, Apt#E1  
Springfield, MA
10. Juan Burgos-Montes  
40 Worthington Street, Apt#103  
Springfield, MA

Further discovery and developments in this case may dictate the need to identify additional individuals likely to possess discoverable information that the plaintiff may use to support its claims or defenses.

**B. Rule 26(a)(1)(B)**

**[A] copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party and that the party may use to support its claims or defenses, unless solely for impeachment.**

The plaintiff identifies the following as documents that it may use to support its claims or defenses in this case:

1. Baystate Medical Center medical records; and
2. Voorhees Pediatric Rehabilitation Hospital medical reports and notes.

Further discovery and developments in this case may dictate the need to identify additional relevant documents and/or tangible objects that plaintiff may use to support its claims or defenses.

**C. Rule 26(a)(1)(C)**

**[A] computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

1. Plaintiff's Medical Bills:  
Barbara J. Leech, Ph. D;  
Baystate Medical Center; and  
Cooper Health System Clinic.

Amount: \$ 26,440.39

2. Plaintiff's Lost Wages  
Amount: \$48,000.00
3. Plaintiff's Pain and Suffering  
Amount: \$250,000.00
4. Plaintiff's Scarring and Disfigurement  
Amount: \$250,000.00

Further discovery and development of damages in this case may dictate the need to identify additional relevant documents on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

- D. **Rule 26(a)(1)(D)**  
**[F]or inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Not applicable.

Dated this 11 day of June 2004.

Plaintiff  
Johanz X Santos, ppa, Denise Colon,  
Denise Colon, Individually, and  
Jesus Santos  
By His Attorneys,

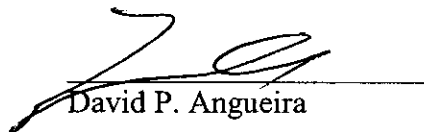
  
Edward M. Swartz, BBO#489540  
David P. Angueira, BBO#019610  
SWARTZ & SWARTZ  
10 Marshall Street  
Boston, MA 02108  
(617) 742-1900

**CERTIFICATE OF SERVICE**

I, David P. Angueira, attorney for the plaintiffs, Johanz X Santos, ppa, Denise Colon, Denise Colon, Individually, and Jesus Santos, hereby certify that on the 11 day of June, 2004, a true copy of the foregoing Plaintiffs Johanz X Santos, ppa, Denise Colon, Denise Colon, Individually, and Jesus Santos Initial Disclosure Pursuant to Fed. R. Civ. P. 26(a)(1), was served by mail, postage prepaid, directed to:

Dwight D. Valentine, Esq.  
Niarchos, Sullivan, Valentine & Malay  
50 Staniford Street  
Boston, MA 02114

John D. Curran, Esq.  
Smith & Brink, P.C.  
122 Quincy Shore Drive  
Quincy MA 02171

  
David P. Angueira